

1 PAUL S. PADDA, ESQ.  
Nevada Bar No. 10417  
2 [psp@paulpaddalaw.com](mailto:psp@paulpaddalaw.com)  
NATHANIEL R. CARLSON, ESQ.  
3 Nevada Bar No. 16057  
[ncarlson@paulpaddalaw.com](mailto:ncarlson@paulpaddalaw.com)  
4 SRILATA R. SHAH, ESQ.  
Nevada Bar No. 6820  
5 [sri@paulpaddalaw.com](mailto:sri@paulpaddalaw.com)  
**PAUL PADDA LAW, PLLC**  
6 4560 S. Decatur Boulevard, Ste. 300  
Las Vegas, Nevada 89103  
7 Telephone: (702) 366-1888  
Facsimile: (702) 366-1940  
8 Attorneys for Plaintiff

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11  
12 ASHLY RAI,

13 Plaintiff,

14 v.

15 COSTCO WHOLESALE CORPORATION, a  
Foreign Corporation; DOES I through X,  
16 inclusive; and ROE CORPORATIONS I  
through X, inclusive,

17 Defendants.  
18

Case No. 2:24-cv-00161-JAD-EJY

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINE  
DATES (SECOND REQUEST)**

19 Pursuant to Federal Rule of Civil Procedure 6 and the Court's Local Rules of Civil Practice  
20 LR IA 6-1 and LR 26-3, the parties to this action respectfully request that the Court approve this  
21 Stipulation to extend the current discovery deadlines by 45 days. Counsel for the respective parties  
22 communicated regarding this matter and agree that the requested extension is necessary and  
23 supported by good cause. This is the parties' second request for an extension of the discovery  
24 deadlines.  
25

26 ...

27 ...  
28

**I. DISCOVERY COMPLETED BY THE PARTIES:**

The parties have served their initial disclosures as well as several supplements thereto. Plaintiff's Independent Medical Examination ("IME") was completed on May 7, 2024. Plaintiff's deposition took place on June 26, 2024. The IME report has been disclosed by the Defendant. Responses to written discovery by Plaintiff were due on June 24, 2024, and provided by Plaintiff. Responses to written discovery by Defendants are due on September 13, 2024.

**II. DISCOVERY WHICH REMAINS TO BE COMPLETED:**

Plaintiff intends to depose the relevant claims handling personnel of Defendant, COSTCO WHOLESALE CORPORATION ("COSTCO"), including their 30 b (6) representative all of whom reside out of state. The parties have propounded and are in the process of responding to the written discovery. The parties will also disclose and depose experts. The experts will include several medical providers and human factors experts.

**III. REASONS WHY DISCOVERY WAS NOT SATISFIED OR COMPLETED WITHIN THE TIME LIMIT SET BY THE DISCOVERY PLAN:**

The parties have been working diligently throughout the discovery process. As indicated above, the parties engaged in discovery efforts in terms of disclosures and written discovery. An IME of the Plaintiff was conducted on May 7, 2024. The IME report was disclosed by Defendants. Plaintiff's deposition took place on June 26, 2024. Plaintiff recently underwent foot surgery related to the injuries sustained in the slip and fall at COSTCO. Plaintiff continues to treat for her injuries. Plaintiff is continuing to supplement the medical records and billing. The disclosure of the updated medical records is needed for the parties to include said information in their expert reports. Defendants responses to the written discovery is needed for the human factors expert to provide their expert opinions. The parties are also discussing possible settlement in this case prior to incurring costs for experts.

**IV. GOOD CAUSE EXISTS TO GRANT THE REQUESTED EXTENSION**

As stated above, the parties have been working diligently on all discovery-related items. There are outstanding written discovery responses and deposition of the parties and experts that need to be completed. The parties anticipate this extension will be a reasonable amount of time for

all depositions and disclosures mentioned above to be completed.

**V. SCHEDULE FOR COMPLETION OF ALL REMAINING DISCOVERY:**

The parties request that the pertinent discovery deadlines set forth in the Court's Scheduling Order be continued 45 days, as follows:

The parties propose the following discovery schedule to be approved by the Court:

<b><u>EVENT</u></b>	<b><u>CURRENT DEADLINE</u></b>	<b><u>PROPOSED DEADLINE</u></b>
Discovery Cut-Off	October 21, 2024	December 05, 2024
Amending Pleadings and Adding Parties	July 22, 2024	September 05, 2024
Initial Expert Disclosures	August 20, 2024	October 04, 2024
Rebuttal Expert Disclosures	September 20, 2024	November 04, 2024
Dispositive Motions	November 20, 2024	January 03, 2025
Pre-Trial Order <sup>1</sup>	December 20, 2024	February 03, 2025

Despite best efforts, the parties have not been able to complete the discovery that is necessary and needed at this juncture. However, the parties believe that, should the Court approve this Stipulation for an extension of discovery deadlines, the additional time requested herein will be sufficient to allow the parties to complete discovery.

...

...

...

...

...

<sup>1</sup> If a dispositive motion is filed, the deadline for filing the joint pretrial order will be suspended until 30-days after the decision on the dispositive motions or further Court order. See LR 26-1(b)(5).

1 ...

2 IT IS RESPECTFULLY SUBMITTED.

3  
4 Dated this 19th day of August 2024  
5 RANALLI ZANIEL FOWLER &  
6 MORAN, LLC

Dated this 19th day of August 2024.  
PAUL PADDA LAW, PLLC.

7 /s/ Maegun C. Mooso  
8 George M. Ranalli, Esq.  
9 Nevada Bar No. 5748  
10 Maegun Mooso, Esq.  
11 Nevada Bar No. 15067  
12 2340 W. Horizon Ridge Parkway, #100  
Henderson, NV 89052  
ranalliservice@ranallilawyers.com  
Attorneys for Defendant,  
Costco Wholesale Corporation

/s/ Srilata R. Shah  
Paul S. Padda, Esq.  
Nevada Bar No. 10417  
Srilata R. Shah, Esq.  
Nevada Bar No. 6820  
4560 S. Decatur Blvd., Ste. 300  
Las Vegas, NV 89103  
sri@paulpaddalaw.com  
Attorneys for Plaintiff

13  
14 IT IS SO ORDERED

15   
16 UNITED STATES MAGISTRATE JUDGE

17 Date: August 19, 2024

18  
19 Prepared and submitted by:

20 PAUL PADDA LAW, PLLC

21 /s/ Srilata R. Shah

22 Srilata R. Shah, Esq.  
23 Nevada Bar No. 6820  
24 4560 S. Decatur Blvd., Ste. 300  
25 Las Vegas, NV 89103  
Attorneys for Plaintiff